

THIRD REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Holcim (U.S.), Inc.
Poverty Point Limestone Quarry

M/045/012
August 9, 2005

R647-4-105 - Maps, Drawings & Photographs

105.1 Topographic base map, boundaries, pre-act disturbance

Map 105.1 should be corrected to show that the 1500' of road located on BLM is a part of the total disturbance. Also a portion of the road located on SITLA ground is not included in the disturbance outline. Please correct this oversight and adjust the acreage to be disturbed, if necessary. (DJ)

105.2 Surface facilities map

A 1"=100' Surface Facilities map was resubmitted with this latest review response. This map now shows the locations of a temporary truck parking including loading area, temporary crusher location and the water tank site.

The truck parking and temp crusher areas are located outside the area of the proposed mine disturbance. The temp trucking area is also designated as a loading area, but the stockpile area located in excess of 600 feet to the northwest. The overburden pile is located between the stockpile and the crusher/loading areas. Also the stockpile area is located ~600 feet from the temp crusher area. Please label each stockpile with what will be contained in each. (DJ)

The water tank is located on the southern edge of the disturbed area outline. Is this location correct? (DJ)

The plan indicates that blasting supplies will be stored off-site. Please show the location of this storage area on the surface facilities map. If it is to located outside the present disturbance outline, this acreage figure will need to be adjusted to encompass this additional area. (DJ)

Please show the location of the above ground fuel tank on this map. (DJ)

R647-4-110 - Reclamation Plan

110.3 Description of facilities to be left (post mining use)

This part of the plan states that the portion of the road located on BLM ground will be left unless SITLA request its removal.

SITLA does not dictate features left on federally owned ground. Please amend this statement to reflect that this road will be reclaimed at closure of the quarry unless otherwise instructed by the BLM. (DJ)

Reclamation of these roads should be included in the surety calculations. If at a later date it is decided that they will be allowed to remain, the surety can be adjusted at that time. (DJ)

The plan states that soil to be used for reclamation may be removed from a borrow area near the quarry.

Please show the location of this borrow area and identify the amount of material that will be available to be used for reclamation. If a borrow pit is to be used to supply soils for reclamation, the area to be disturbed to harvest the soil should be included in the total disturbance of the quarry. (DJ)

R647-4-112 - Variance

In order to allow the final quarry face to remain at a 3v:1h, a study will need to be completed to demonstrate that this highwall will be stable at this angle. The variance that was granted for the original permit application will not apply to this submittal. (DJ)

R647-4-113 - Surety

The header on Holcim's surety estimate states "Reducing the quarry highwall to 45 degrees will no longer be required". The variance was allowed for the original permit. See comment above under R647-4-112-Variance.

The calculation for removal of surface limestone @ a 6" depth over 80% of the quarry is estimated at 20317 cy.

A calculation for 35.6 acres of quarry @ 80% and a 6" depth results in a figure of 22973 cy. Please explain how the figure of 20317 cy was arrived at. (DJ)

Ripping the quarry floors is calculated at 80% of the quarry.

All of the areas disturbed by this mining venture, with the exception of the highwalls, will need to be ripped before amendments and seeding are initiated. (DJ)

The plan states that overburden will be taken to the quarry base and used as fill against the highwall.

No estimate has been noted in the surety for this activity. Please correct this oversight. (DJ)

No entry has been made in the estimate for the removal of the limestone fill material at the present crusher pad. The original plan stated that because this pad was built on soil that the fill material from the quarry floor and processing area to expose the topsoil during reclamation.

An estimate of the amount of material to be removed should be made and a line item in the surety estimate to cover this activity. (DJ)

A line entry has been made to allow for the regrading of soils from the NW and S edge into the quarry.

Because these soil stockpiles have not been located, it is difficult to ascertain if the use of a dozer to spread this resource is reasonable. Some load and haul of this material may be

necessary for some of the longer push distances. Because a soil survey is not available it is difficult to ascertain the amount of soil to be replaced during reclamation. An estimate of the depth of the soil to be placed on the site needs to be made in order to accurately calculate a surety amount for this activity. If removal of material from the proposed borrow pit is anticipated, a calculation of this material will also be needed. (DJ)

Fertilization of the site is shown as utilizing 110lb/acre diammonium phosphate is shown in the estimate.

The text of the plan indicates that 10 tons/acre of composted manure will be used in place of the chemical fertilizer. The cost for this material is \$350/acre. Please correct the estimate to reflect this change. (DJ)

Several units costs used in the estimate are incorrect. The updated costs are as follows:

Recontouring roads to upper quarry benches –trackhoe \$1.45/lf
Mulching (2 tons/acre alfalfa) \$400/acre

The percentage figure, which is now being used for escalation, is now 4.44%
This bond calculated during the year of 2005 will be escalated to the year of 2010, (DJ)

R647-4-115 - Confidential Information

The plan states that confidential material is contained in this application.
Please identify which portion of the plan Holcim would like to be considered confidential. (DJ)